October 21, 2020

Via CM/ECF

Honorable Lewis J. Liman United States District Judge United States District Court Southern District of New York 500 Pearl Street, Room 701 New York, NY 10007 (212) 805-0226

Re: Culbertson et al. v. Deloitte Consulting LLP, Case No. 1:20-cv-3962-LJL—Agreed Briefing Schedule on Defendant's Motion to Dismiss

Dear Judge Liman:

Pursuant to the Court's Individual Practices in Civil Cases, the parties in the above-styled action have agreed to a briefing schedule on Defendant Deloitte Consulting LLP's ("Deloitte") Motion to Dismiss, filed today, October 21, 2020. As set out in the parties' Joint Letter filed on September 10, 2020 (Dkt. No. 77):

- Plaintiffs' Opposition is due by November 23, 2020.
- Defendant's Reply is due by December 14, 2020.

The parties have also agreed to a 40-page limit for principal briefs (opening brief and opposition) and a 25-page limit for Defendant's reply brief.

Respectfully submitted,

/s/ Jeffrey S. Goldenberg
Jeffrey S. Goldenberg

(Admitted *Pro hac vice*)
Goldenberg Schneider, L.P.A.
4445 Lake Forest Drive, Suite 490
Cincinnati, OH 45242
jgoldenberg@gs-legal.com
(513) 345-8297

John A. Yanchunis (Admitted *Pro hac vice*) Morgan & Morgan 201 North Franklin Street, 7th Floor Tampa, FL 33602 jyanchunis@forthepeople.com (813) 275-5272

Amanda Peterson Morgan & Morgan 90 Broad Street, Suite 1011 New York, NY 10004 apeterson@forthepeople.com (212) 738-6299

Joseph M. Lyon (Admitted *Pro hac vice*) The Lyon Firm, P.C. 2754 Erie Ave. Cincinnati, OH 45208 <u>ilyon@thelyonfirm.com</u> (513) 381-2333

Charles E. Schaffer (Admitted *Pro hac vice*)
Levin Fishbein Sedran & Berman LLP 510 Walnut Street, Suite 500
Philadelphia, PA 19106
cschaffer@lfsblaw.com
(215) 592-1500

Gary E. Mason (Admitted *Pro hac vice*) Mason Lietz & Klinger LLP

Respectfully submitted,

/s/ Phyllis B. Sumner

Phyllis B. Sumner (Admitted *pro hac vice*) Elizabeth D. Adler (Admitted *pro hac vice*) 1180 Peachtree Street, NE Suite 1600 Atlanta, GA 30309 psumner@kslaw.com eadler@kslaw.com (404) 572-4600

Alvin Y. Lee King & Spalding LLP 1185 Avenue of the Americas 34th Floor New York, NY 10036 Alvin.lee@kslaw.com (212) 556-2100

Counsel for Defendant Deloitte Consulting LLP

5101 Wisconsin Ave NW, Suite 305 Washington, D.C. 20016 gmason@masonllp.com (202) 640-1160

Laurence D. King
Matthew B. George
(*Pro hac vice* forthcoming)
Kaplan Fox & Kilsheimer LLP
1999 Harrison Street, Suite 1560
Oakland CA 94612
lking@kaplanfox.com
mgeorge@kaplanfox.com
(415) 772-4700

Frederic S. Fox
David A. Straite
Kaplan Fox & Kilsheimer LLP
850 Third Avenue
New York, NY 10022
ffox@kaplanfox.com
dstraite@kaplanfox.com
(212) 687-1980

Katherine M. Aizpuru (*Pro hac vice* forthcoming) Hassan A. Zavareei (*Pro hac vice* forthcoming) Tycko & Zavareei LLP 1828 L Street NW, Suite 1000 Washington, D.C. 20036 kaizpuru@tzlegal.com hzavareei@tzlegal.com (202) 973-0900

Melissa S. Weiner (*Pro hac vice* forthcoming)
Joseph C. Bourne (*Pro hac* vice forthcoming)
Pearson, Simon & Warshaw, LLP 800 LaSalle Ave., Suite 2150
Minneapolis, MN 55402
weiner@pswlaw.com
bourne@pswlaw.com
(612) 389-0600

Jeff Ostrow
(Pro hac vice forthcoming)
Jonathan M. Streisfeld
(Pro hac vice forthcoming)
Kopelowitz Ostrow Ferguson Weiselberg Gilbert
1 West Las Olas Blvd, Suite 500
Fort Lauderdale, FL 33301
Ostrow@kolalwyers.com
streisfeld@kolawyers.com
(954) 525-410

Katrine Carroll
(Admitted *pro hac vice*)
Kyle A. Shamberg
Carson Lynch LLP
111 W. Washington St., Suite 1240
Chicago, IL 60602
kcarrol@carsonlynch.com
kshamberg@carsonlynch.com
(312) 750-1265

Jonathan M. Jagher (*Pro hac vice* forthcoming)
Kimberly A. Justice (*Pro hac vice* forthcoming)
Freed Kanner London & Millen LLC 923 Fayette Street
Conshohocken, PA 19428
jjagher@fklmlaw.com
kjustice@fklmlaw.com
(610) 234-6487

Tiffany Marko Yiatras (Admitted *pro hac vice*)
CONSUMER PROTECTION LEGAL, LLC 308 Hutchinson Road
Ellisville, Missouri 63011-2029
tiffany@consumerprotectionlegal.com
(314) 541-0317

Francis J. "Casey" Flynn, Jr. LAW OFFICE OF FRANCIS J. "CASEY" FLYNN, JR. 3518A Arsenal Street Saint Louis, Missouri 63118 casey@lawofficeflynn.com

(314) 662-2836

Javier L. Merino (Fed. Bar No. JM4291) DANNLAW 372 Kinderkamack Road, Suite 5 Westwood, NJ 07675 notices@dannlaw.com (201) 355-3440

Marc E. Dann (Admitted *pro hac vice*) Brian D. Flock DANNLAW PO Box 6031040 Cleveland, OH 44103 notices@dannlaw.com (216) 37309539

Thomas A. Zimmerman, Jr. (Admitted *pro hac vice*)
Sharon A. Harris
ZIMMERMAN LAW OFFICES, P.C.
77 W. Washington Street, Suite 1220
Chicago, Illinois 60602
tom@attorneyzim.com
sharon@attorneyzim.com
(312) 440-0020

Matthew Ryan Wilson (Admitted *Pro hac vice*)
Michael Joseph Boyle, Jr. (Admitted *pro hac vice*)
Meyer Wilson Co., LPA
1320 Dubline Road, Suite 100
Columbus, OH 43215
mwilson@meyerwilson.com
mboyle@meyeerwilson.com
(614) 224-6000

Counsel for Plaintiffs